United States Courts Southern District of Texas FILED

May 14, 2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA	§	
	S	
V.	S	
	S	4.0.
DANIEL JAMES	§	criminal no. <b>4:25-cr-00247</b>
	§	
Defendant	§	
	§	JUDGE <b>Hanen</b>

#### INDICTMENT

THE GRAND JURY CHARGES THAT:

#### INTRODUCTION

At all times material to this Indictment, Quik Food store, Star Shop store and Short Stop store are engaged in the business of purchase and sales of goods to others which are shipped in interstate commerce and which affect interstate commerce.

#### COUNT ONE

#### Title 18, United States Code, § 1951(a) -Interference with Commerce by Robbery

On or about March 12, 2025, in the Houston Division of the Southern District of Texas,

DANIEL JAMES

defendant herein, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of QUIK FOOD STORE located at 5402 Birdwood, Houston, Texas, to wit: United States currency, which was in the possession and custody of an employee of Quik Food Store, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

#### COUNT TWO

# Title 18, United States Code, § 924(c)(1)(A)(ii): Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about March 12, 2025, in the Houston Division of the Southern District of Texas,

#### DANIEL JAMES

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count One.

In violation of Title 18, United States Code, § 924(c)(1)(A)(ii).

#### COUNT THREE

### Title 18, United States Code, § 1951(a) -Interference with Commerce by Robbery

On or about March 13, 2025, in the Houston Division of the Southern District of Texas,

#### DANIEL JAMES

defendant herein, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of STAR STOP STORE located at 3215 South Loop West, Houston, Texas, to wit: United States currency, which was in the possession and custody of an employee of Star Stop Store, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

#### COUNT FOUR

# Title 18, United States Code, § 924(c)(1)(A)(ii): Brandishing of a Firearm During and in Relation to a Crime of Violence

On or about March 13, 2025, in the Houston Division of the Southern District of Texas,

#### DANIEL JAMES

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count Three.

In violation of Title 18, United States Code, § 924(c)(1)(A)(ii).

#### COUNT FIVE

#### Title 18, United States Code, § 1951(a) -Interference with Commerce by Robbery

On or about March 13, 2025, in the Houston Division of the Southern District of Texas,

#### DANIEL JAMES

defendant herein, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and

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"robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of SHORT STOP STORE located at 8035 W. Airport, Houston, Texas, to wit: United States currency, which was in the possession and custody of an employee of Short Stop Store, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, § 1951(a).

#### COUNT SIX

Title 18, United States Code, § 924(c)(1)(A)(ii): 
Brandishing of a Firearm During and in Relation to a Crime of

Violence

On or about March 13, 2025, in the Houston Division of the Southern District of Texas,

#### DANIEL JAMES

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which he may be prosecuted in a court of the United States, that being Interference with Commerce by Robbery, as alleged in Count Five.

In violation of Title 18, United States Code, § 924(c)(1)(A)(ii).

A TRUE BILL:

### Original Signature on File FOREMAN OF THE GRAND JURY

NICHOLAS J. GANJEI United States Attorney

Jill Jenkins Stotts

Assistant United States Attorney